

ER/WM&I DDT



000110692

Source/Driver: (Name & Number from ISP, IAG milestone, Mgmt. Action, Corres. Control, etc.)

Closure #: (Outgoing Correspondence Control #, if applicable)

Due Date

J. R. Cirillo

Originator Name

G. D. DiGregorio

QA Approval

J. E. Law

A. M. Tyson

Contractor Manager(s)

A. K. Sieben

Kaiser-Hill Program Manager(s)

T. G. Hedahl

Kaiser-Hill Director

Document Classification
Review Waiver Per
Classification office

Document Subject:

Transmittal - OU1 IM/IRA Modification - AMT-073-97

KH00003NS1A

July 10, 1997

Discussion and/or Comments:

Enclosed please find a copy of the OU1 IM/IRA Modification request. The first objective of the OU1 IM/IRA Modification is to create a single, discrete, identifiable regulatory authority that governs operations at the Consolidated Water Treatment Facility (CWTF) located in Building 891. The second objective is to update the OU1 IM/IRA consistent with RFCA and the Integrated Monitoring Plan (IMP).

Please review and transmit the modification request to DOE at your earliest convenience.

JRC:slm

Enclosure:
As Stated

cc:
J. R. Cirillo
J. E. Law
A. M. Tyson
RMRS Records

DRAFT

Date

97-RF-

Norma Casteneda
ES&H Program Assessment
DOE, RFFO

OU1 IM/IRA MODIFICATION - AKS-xxx-97

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Please review and transmit the modification request to EPA and CDPHE at your earliest convenience.

Please contact Russ Cirillo at 966-5876 if you have any questions regarding this Modification.

A. K. Sieben
Waste & Remediation Operations

AKS:xxx

Orig. and 1 cc - N. Casteneda

Enclosure:
As Stated

cc:
J. R. Cirillo
J. E. Law

DRAFT

Date

Tim Rehder
EPA
999 18th Street
Suite 500
Denver, CO 80202

OU1 IM/IRA MODIFICATION - XXX-XXX-97

The purpose of this correspondence is to request a modification to the Interim Measures/Interim Remedial Action Plan and Decision Document 881 Hillside Area, Operable Unit No. 1, January 1990, (OU1 IM/IRA). DOE is requesting this modification pursuant to RFCA ¶127.

Objectives

There are two objectives. The first objective of the OU1 IM/IRA Modification is to create a single, discrete, identifiable regulatory authority that governs operations at the Consolidated Water Treatment Facility (CWTF) located in Building 891. The second objective is to update the OU1 IM/IRA consistent with RFCA and the Integrated Monitoring Plan (IMP).

Approach

The overall approach, and the relationship of the OU1 IM/IRA Modification to the OU2 IM/IRA Modification is depicted on the chart in Attachment 1. It should be evident from the chart that the OU1 IM/IRA Modification and the recently submitted OU2 IM/IRA Modification have parallel purposes and complement one another.

The OU1 IM/IRA Modification is comprised of this cover letter and three attachments. Attachment 1 is a chart that depicts the elements of both the original OU1 IM/IRA and the original OU2 IM/IRA. The chart also depicts the overall strategy to modify and integrate these IM/IRAs.

Attachment 2 focuses on the CWTF. First, Attachment 2 presents a new Sampling and Analysis Plan (SAP) for the CWTF. The SAP covers not only long-term CWTF effluent monitoring, but also provides interim monitoring to cover the IHSS 119.1 Collection Well (OU1); the IHSS 119.1 French Drain (OU1); the 881 Footing Drain (OU1); SW059 (OU2) SW061 (OU2); and SW132 (OU2) until transferred to the IMP. In addition, the SAP contains the new, up to date chemical-specific ARARs for the CWTF.

Second, Attachment 2 provides an operational framework for the CWTF that introduces the CDPHE Wastewater Treatment Unit Policy (WWTU Policy) as a CERCLA to-be-considered criteria for accepting CERCLA/RFCA remediation wastewater and includes a discussion of OU1 IM/IRA and OU2 IM/IRA location and action-specific ARARs. For convenient reference, a copy of the CDPHE WWTU Policy is also included.

The purpose of Attachment 3 of the OU1 IM/IRA Modification is to ensure that the water sources originally addressed in the OU1 IM/IRA continue, without a lapse in coverage, to be addressed in a manner that is consistent with RFCA. In addition, the administrative transfer of the monitoring obligations to the IMP will ensure that the one remaining OU1 IM/IRA water source (881 Footing Drain) is handled consistent with the approach taken in the OU1 CAD/ROD and with the OU2 IM/IRA Modification.

DOE believes this proposed OU1 IM/IRA modification is justified because it will streamline operations at the CWTF, it will address all OU1 IM/IRA monitoring obligations and it will update and fully integrate the OU1 and OU2 IM/IRAs into the RFCA process.

Tim Rehder
Page 2

RFCA ¶127 provides a 30-day review period, at the close of which the request is approved, or is denied with a written explanation. DOE suggests that a meeting be held in the middle of the 30-day review cycle to address questions and to facilitate final approval. To that end, Norma Casteneda will contact the project coordinators to schedule the review session. If you have other questions or comments, please do not hesitate to contact Ms. Casteneda at 966-4226.

Contact
Title

XXX:xxx

Attachments:
As Stated

cc:

DRAFT

Date

Mr. Steve Tarlton
Colorado Dept. of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80222-1530

OU1 IM/IRA MODIFICATION - XXX-XXX-97

Dear Mr. Tarlton:

The purpose of this correspondence is to request a modification to the Interim Measures/Interim Remedial Action Plan and Decision Document 881 Hillside Area, Operable Unit No. 1, January 1990, (OU1 IM/IRA). DOE is requesting this modification pursuant to RFCA ¶127.

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5

Steve Tarlton
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Contact
Title

XXX:xxx

Attachments:
As Stated

cc:

6/6